

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF ARKANSAS
FAYETTEVILLE DIVISION**

**JILL DILLARD, JESSA SEEWALD,
JINGER VUOLO, and JOY DUGGAR**

PLAINTIFFS

vs.

CASE NO. 5:17-5089-TLB

**CITY OF SPRINGDALE, ARKANSAS;
WASHINGTON COUNTY, ARKANSAS;
KATHY O'KELLEY, in her individual and
official capacities;
ERNEST CATE, in his individual and official capacities;
RICK HOYT, in his individual and official capacities;
STEVE ZEGA, in his official capacity;
And DOES 1-10, inclusive**

DEFENDANTS

AFFIDAVIT OF DANA MARTIN

Comes the affiant, Dana Martin, and hereby truthfully states:

1. I am above the age of 18 and competent to set forth the facts of this Affidavit. I am a Civil Processor for Martin Investigation Services, Fayetteville, Arkansas.
2. On August 24, 2021, I was provided a Subpoena Duces Tecum for Jim Bob Duggar and Michelle Duggar to produce documents.
3. On August 24, 2021, I attempted service to the Duggars at their residence at approximately 5:00 pm. The gate was closed and no one would answer my call on the call box or respond to my horn honking although I saw people going inside and outside the residence.
4. I returned to the address at 7:00 pm. After surveillance for a while, one of the daughters (Jessa) came in through the side road to the house.
5. The front gate opened, and I proceeded to the house.



6. I made contact with daughter (Jessa), I asked her if her parents were home. I could hear lots of voices inside.

7. Jessa returned and asked me to leave, I stated my business and she asked if I could leave my card and she would give it to her parents.

8. Pursuant to the Subpoena to Testify at a Deposition in a Civil Action (the "Subpoena") for Jim Bob Duggar and Michelle Duggar issued on September 17, 2021, I completed the following tasks set forth below:

9. On September 17, 2021, between the hours of 4:30 pm to 7:30 pm, I arrived at the Champion Motors to serve the Subpoena to Jim Bob and Michelle Duggar.

10. Upon arrival to the Duggar compound, I was able to see members of the Duggar family but I was unable to make contact with anyone at the residence due to a locked gate.

11. A drone from the residence flew over to my location outside of the residence.

12. On September 18, 2021, between the hours of 8:00 am to 11:00 am, I conducted surveillance at Champion Motors/Duggar Compound in an attempt to make contact with Jim Bob Duggar and Michelle Duggar.

13. On September 19, 2021, between the hours of 8:00 am to 10:00 am and 3:30 pm to 5:00 pm I conducted surveillance at the Duggar Compound and Cross Church in Springdale in an attempt to make contact with Jim Bob Duggar and Michelle Duggar.

14. On September 20, 2021, between the hours of 8:00 am to 10:30 am and 11:20 am to 1:20 pm, I conducted surveillance at the Duggar Compound. Once again, a drone flew over towards me while I was waiting outside of the Compound.

15. After a total of 15 hours of surveillance, I never was able to see Jim Bob Duggar or Michelle Duggar or to have members of the family assist me in serving the Subpoena.

16. The Duggar property is highly surveilled with cameras, drones and gates.

17. It is my knowledge that they have three (3) entrances to the residence.

18. I made several attempts of speaking into the call box at the residence with no response, although there were at least fifteen (15) cars at this residence at all times.

19. I made various attempts to speak to the drone that flew out to my location from the residence.

20. Each time I made contact with a family member or spoke through to the call box or to the drone, I identified myself and made known my purpose to serve a Subpoena.

21. Further Affiant Sayeth Not.

Dana Martin
Dana Martin

SUBSCRIBED and SWORN TO before me, a Notary Public, on this 12th day of November, 2021.

Janet R Johnson
Notary Public
My Commission Expires:



Commission Expires